

**REMARKS/ARGUMENTS**

Reconsideration and allowance are respectfully requested. All of the claims are rejected under 35 U.S.C. § 103(a) over a combination of references including U.S. Patent Application Publication No. 2003/0046695 to Billmaier, et al. (“Billmaier”).

Billmaier was filed after the filing date of the present application and is a continuation-in-part (CIP) of a parent application (10/097,174) filed prior to the present application. Any new matter added in the CIP application (i.e., Billmaier) was added after the filing of the present application and is thus not prior art. In other words, anything in Billmaier relied upon by the Office Action must have also been disclosed in the parent application to qualify as prior art.

However, the portions in Billmaier relied upon by the Office Action are not disclosed in the parent application. In particular, the parent application fails to teach or suggest that a text description may be overlaid or superimposed over a graphical representation, as alleged by the Office Action. Additionally, the parent application fails to teach or suggest the alleged motivation in Billmaier for combining relied upon by the Office Action.

Accordingly, it is submitted that the alleged teachings of Billmaier relied upon by the rejection do not qualify as prior art. And, because all rejections rely on these alleged teachings of Billmaier, it is submitted that no *prima facie* rejections remain and the claims are allowable.

Should the Examiner have any questions, the Examiner is invited to contact the undersigned at the number below.

Respectfully submitted,

BANNER & WITCOFF, LTD.

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